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From:

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To:

Cc:

Subject: Transferee liability for foreign corporate shareholders

Our branch doesn't deal with transferee liability questions, other than perhaps withholding tax under section 1445 on the distribution of U.S. real property interests.

Section 367(e)(2) causes recognition in certain instances where there is a section 332 liquidation of a domestic subsidiary and the parent corporation is foreign. We would handle questions regarding whether section 367(e)(2) is applicable. Transferee liability is not a matter under those rules.

If there is no foreign parent owning 80 percent of the domestic subsidiary, section 331 might apply. We do not cover transferee liability after a section 331 liquidation.

I think this is an issue for . I would suggest contacting their front office to find the right person.